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11 Attorneys for Defendant
12 Eli Lilly and Company, a corporation
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

In re: INCRETIN-BASED THERAPIES
PRODUCTS LIABILITY LITIGATION

As to All Related and Member Cases

CASE NO. 13-md-02452 AJB (MDD)

**DECLARATION OF VALERIE E.
TORRES IN SUPPORT OF
MOTION FOR LEAVE TO
WITHDRAW AS ATTORNEY OF
RECORD BY VALERIE E.
TORRES**

Judge: Hon. Anthony J. Battaglia
Courtroom: 3B

1 I, Valerie E. Torres, declare as follows:

2 1. I am over the age of 18, and admitted to practice law in the State of
3 California.

4 2. Unless otherwise indicated, I have personal knowledge of the matters
5 set forth below.

6 3. I am currently employed in the San Diego, California office of
7 Latham & Watkins LLP.

8 4. As of July 16, 2014, I will no longer be associated with Latham &
9 Watkins LLP.

10 5. Nina M. Gussack and Kenneth J. King of Pepper Hamilton LLP and
11 Stephen P. Swinton of Latham & Watkins LLP will continue to serve as Lead
12 Counsel for Eli Lilly and Company (“Eli Lilly”) in this proceeding.

13 6. Eli Lilly has consented to my withdrawal through lead counsel for
14 Eli Lilly, Pepper Hamilton LLP.

15 7. I have caused the Motion for Leave to Withdraw and all attachments,
16 including this Declaration, to be served on Eli Lilly through in-house counsel
17 Christopher Paul Gramling via Federal Express.

18 8. By electronically filing the Motion for Leave to Withdraw and all
19 attachments with the Clerk of the Court using the CM/ECF system, I have caused
20 the Motion for Leave to Withdraw and all attachments, including this Declaration,
21 to be served via the Court’s CM/ECF system.

22 I declare the foregoing under penalty of perjury.

23 Executed on July 15, 2014, at San Diego, California.

24 Dated: July 15, 2014

LATHAM & WATKINS LLP

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By: s/ Valerie E. Torres
valerie.torres@lw.com

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Attorneys for Defendant
ELI LILLY AND COMPANY

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